

Dockets Management Branch (HFA – 305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

2008 JUN 11 11:46

Docket Number: 02N-0276

Dear Sirs:

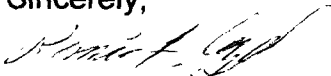
After reviewing the Prior Notice of Imported Food Shipments Proposal, I believe that the proposal inadequately addresses the foreign Food Manufacturer's supply chain.

The proposed regulation requires all domestic processors, holders, and manufacturers between the Farm and the retailer to register. This gives complete supply chain visibility and traceability.

However, the proposed regulation requires only the final foreign manufacturer to register. This leaves the entire foreign supply chain open for potential bio-terrorism. It ignores all foreign food ingredient processors. In one example given in the proposal, a US cooperative that processes wheat into flour would be required to register, yet a flour supplier to a processor that exports into the US would not be required to register. In addition to providing inadequate traceability, this proposed regulation places the US ingredient manufacturers at a competitive disadvantage.

I fully support the protection of our food supply and the complete food supply chain as related in the referenced docket. I would request however that the proposed regulations be revised to require that imported foods and ingredients be required to meet the same requirements that are required of the US domestic foods and ingredients suppliers; requirements that will provide complete trackability and traceability of all foods and all ingredients back to their origin and insure the safety of our total food supply.

Sincerely,



Ronnie Floyd

President ; Southwest Guar Cooperative

Cc: Rep. Larry Combest Texas 19th Congressional District
Senator Kay Hutchison
Senator John Cornyn

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